On behalf of the American Public Human Services Association (APHSA), the bipartisan membership association representing state and local human services agencies, and our affinity group of child welfare agency leaders, the National Association of Public Child Welfare Administrators (NAPCWA), we appreciate the opportunity to provide comment on the proposed revisions to the IV-E Prevention Services Clearinghouse Handbook of Standards and Procedures, Draft Version 2.0.

We commend the Administration for Children and Families (ACF) for its commitment to transparency and responsiveness, as evidenced by the comprehensive overview of the proposed revisions and its efforts to incorporate public feedback from the previous comment period in 2021. APHSA recognizes the complexity of the task at hand and the importance of continuously refining procedures to align with the evolving landscape of child welfare and the needs of families and communities.

APHSA is in agreement with the aim to align the Clearinghouse standards with the goals outlined in the Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. The emphasis on inclusivity, diverse populations, and culturally adapted programs is a laudable step toward advancing equity in the child welfare system. This approach reflects a crucial understanding of the multifaceted challenges faced by families and communities, and we encourage ACF to sustain and enhance these efforts. Additionally, we support the expansion of the Clearinghouse’s scope to include a variety of program types, specifically those addressing economic and concrete supports. Recognizing the connection between material hardship and child welfare involvement, inclusion of programs that provide economic stability and tangible support is paramount. This expansion will contribute to a more comprehensive understanding of the factors influencing child welfare outcomes and enable the identification of effective interventions addressing the root causes of family challenges.

To support the creation of an effective and supportive Clearinghouse, APHSA and NAPCWA recommend ACF consider the following when finalizing revisions:
• **Center Community Voice and Expertise:** While recognizing the significant progress made by the Clearinghouse in advancing evidence-based strategies for the well-being of children and families, APHSA emphasizes the critical importance of centering the Clearinghouse's design in principles of equity. The absence of community voices in the prioritization of evidence and the design of review processes is a noteworthy concern. This gap in representation diminishes the Clearinghouse's ability to incorporate lived expertise, hindering a comprehensive understanding of the priorities and preferences of the families the Clearinghouse aims to serve. To address this, we encourage the ACF to explore innovative approaches to integrate community voices directly into the decision-making processes, ensuring a more holistic and inclusive perspective.

• **Prioritize Culturally Specific Programs and Services:** The Clearinghouse needs to go beyond acknowledgment and actively prioritize culturally specific programs and services in its review processes. By doing so, the Clearinghouse can better address the unique needs of diverse populations and contribute to the development of evidence-based practices that are not only effective but also culturally responsive. This prioritization is crucial for the overall success of interventions and services, as it recognizes and respects the rich diversity within our communities.

• **Provide Specific Guidelines on Program Adaptations:** APHSA recommends that the Clearinghouse provide detailed and specific guidelines on program adaptations. Clarifying standards for adapting programs (while maintaining model fidelity) to diverse cultural contexts will not only enhance the relevance and effectiveness of the Clearinghouse's evidence-based practices but will also ensure they are applicable across a broad range of communities. This level of specificity is essential for practitioners, researchers, and policymakers seeking to implement programs that truly meet the needs of the populations they serve.

• **Support Agencies with Administration of Programs Included in the Clearinghouse:** Increased flexibility with definitions of service provisions is needed. An example of this is flexibility with the definition of the Kinship Navigator program. Clear information in the Manual on the expected levels of evidence would create efficiencies and encourage a variety of programs in the Clearinghouse. Also, concerns have been raised about the potential impact of programs currently on the Clearinghouse being re-evaluated and no longer available if the ratings fall.

• **Consider the Changing Needs in Communities:** Agencies are seeing an increase in behavioral health challenges and people who are homeless. Agencies are working to meet their increased needs. APHSA suggests continuing to identify the needs of communities
and ensuring alignment with programs eligible for and prioritized in the Clearinghouse review process in order to support families outside of the child welfare system.

In conclusion, we believe that the proposed revisions, if implemented thoughtfully, will contribute positively to the objectives of the Title IV–E Prevention Services Clearinghouse. ACF’s dedication to transparency, responsiveness, and equity is commendable, and we encourage further consideration of the specific recommendations provided in this comment to enhance the clarity and effectiveness of the proposed changes.

Thank you for considering our comments. We look forward to continued collaboration in improving the Clearinghouse's standards and procedures. For more information, please contact Meg Dygert at mdygert@aphsa.org.

Sincerely,

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